



465904

# BLACK McCUSKEY

## SOUERS & ARBAUGH

Ronald K. Bennington  
Charles J. Tyburski  
Anthony E. Efremoff  
Robert I. Friedman  
Arnold R. Shifman  
Victor R. Marsh  
Daniel M. Jonas  
Randolph L. Snow  
Terrence P. Kessler  
James R. Strawn  
Joel K. Dayton  
Scott P. Sandrock  
Gust Callas  
Bruce M. Soares  
James P. Kameron  
Karen S. Reiland  
Richard D. Dodez  
Mary E. Randall  
John J. Rambacher  
Thomas W. Connors  
Terrence L. Seeberger  
Robert E. Soles, Jr.

A Legal Professional Association

1000 United Bank Plaza,  
220 Market Avenue South,  
Canton, Ohio 44702-2116  
Phone 330-456-8341  
Fax 330-456-5756  
[www.bmsa.com](http://www.bmsa.com)  
[info@bmsa.com](mailto:info@bmsa.com)

July 11, 2001

CORRECTED

David M. Hanhart  
C. Jason Deeds  
Erick L. Bauer  
Francis G. Centrone  
Todd S. Bundy  
Jane M. Timken  
Brian C. Cich  
Gregory L. Taddonio  
Mark E. Owens  
Gordon D. Woolbert, II  
Brian Mertes  
John L. Juergensen  
Susan C. Rank  
Brian L. Metz

Gene Barnhart  
Richard M. Hanhart  
Stephen D. Thompson  
Of Counsel

John D. Jolliffe  
Retired

Deena Sheppard-Johnson  
Enforcement Specialist  
U.S. Environmental Protection Agency  
Remedial Enforcement Support Section  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

RE: Chemical Recovery Systems, Inc., 142 Locust Street, Elyria, Ohio 44035

Dear Ms. Sheppard-Johnson

This letter is in response to the June 26, 2001 letter from Wendy Carney, Chief Remedial Response Branch No.1; requesting potentially responsible parties at the above referenced site to indicate their willingness to participate in future negotiations concerning this site.

This firm represents Harry A. Thomas, a former shareholder of Adelphia, Inc. (an Ohio corporation chartered in 1968 - Charter No. 378572 - changing its name to Harry A. Thomas, Inc. in 1988 and dissolved in 1990).<sup>\*</sup> While not admitting responsibility for any alleged disposal of waste at the site by Adelphia, Inc., our client is willing to participate in future negotiations at this site. We have been authorized to communicate with other potentially responsible parties to explore the formation of a steering committee to formally negotiate with your agency regarding this site.

Sincerely,

Victor R. Marsh

vrm/mbc

G:\vrm\Ltrs\Sheppard-Johnson Adelphia.doc\07/10/01\mbc

<sup>\*</sup>In 1988 some of the assets of Adelphia, Inc. were purchased by third parties who formed a new corporation called Adelphia, Incorporated, now owned by Forest City Technologies, Inc. Future correspondence or requests regarding activities of the Adelphia, Inc. which operated during the 1970's and early 1980's should be directed to the undersigned as legal counsel for Harry A. Thomas.

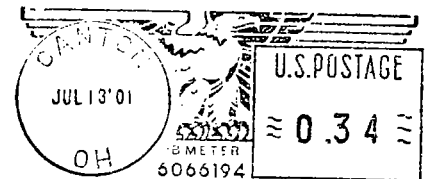
VRM  
BLACK, McCUSKEY, SOUERS & ARBAUGH

A LEGAL PROFESSIONAL ASSOCIATION

1000 UNITED BANK PLAZA

220 MARKET AVENUE SOUTH

CANTON, OHIO 44702



Deena Sheppard-Johnson  
Enforcement Specialist  
U.S. Environmental Protection Agency  
Remedial Enforcement Support Section  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

60604-3511 10

